

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Jeremy Massey, Jr.

Case No. Case: 2:21-mj-30235  
Assigned To : Unassigned  
Assign. Date : 5/20/2021  
USA V. SEALED MATTER (CMP (CMC))

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 14, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 USC § 922(g)(1)

*Offense Description*  
Felon in possession of a firearm

This criminal complaint is based on these facts:  
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: May 20, 2021

City and state: Detroit, Michigan

  
Complainant's signature

Brett J. Brandon, Special Agent (ATF)  
Printed name and title

  
Judge's signature

Hon. R. Steven Whalen, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF AN CRIMINAL COMPLAINT**

I, Brett J. Brandon, being first duly sworn, hereby state:

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, United States Department of Justice, assigned to the Detroit Field Division since July 2013. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and/or participated in numerous criminal investigations involving the illegal possession, use, and sale of firearms, drug trafficking violations, and criminal street gangs.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. ATF is currently conducting a criminal investigation concerning JEREMY MASSEY JR. (B/M; DOB: XX/XX/2001) for violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm), among other state and federal criminal violations.

**PROBABLE CAUSE**

4. On September 10, 2020, the ATF Detroit Crime Gun Enforcement Team arrested MASSEY for violating 18 U.S.C. § 922(g)(3) (unlawful user of a controlled substance in possession of a firearm). On January 20, 2021, MASSEY pled guilty to one count of 18 U.S.C. § 922(g)(3) in the Eastern District of Michigan. At the time of his plea hearing, MASSEY was advised by the Court that as a convicted felon, he could not possess a firearm. On April 21, 2021, MASSEY was sentenced to time served and eighteen months supervised release.

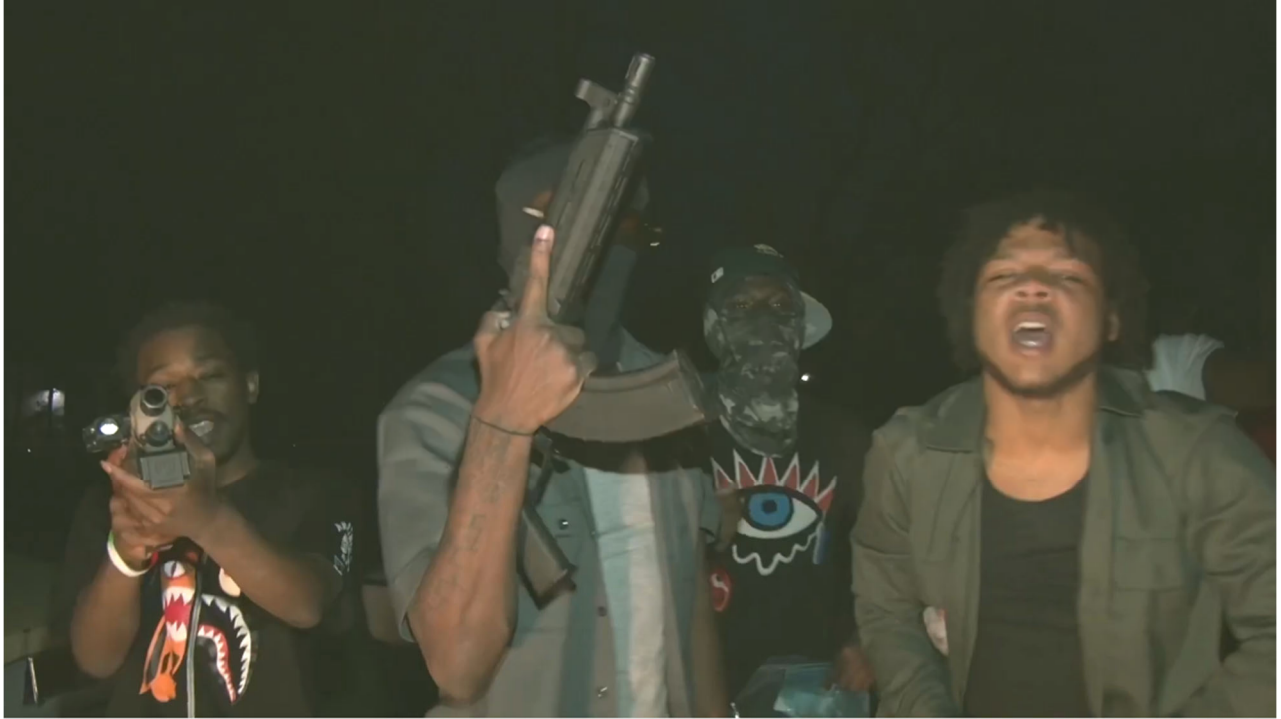
5. During the above-referenced investigation, I reviewed the profile associated with Instagram User ID “eastbabyslim.” I reviewed “stories” (short videos or images that can be posted to an Instagram user’s account and displayed publicly or to the user’s followers in a private account), and other images and videos posted by Instagram User ID “eastbabyslim.” I compared the individual depicted and held out as the Instagram user in the images and videos to a Michigan Secretary of State image of MASSEY dated May 17, 2016. I identified MASSEY as the individual depicted in the images and videos and determined MASSEY accessed and utilized the account.

6. On May 18, 2021, YouTube User “ENDIAN ENT” posted a music video entitled “N.E.M. Dotts x 250 – not again (official video)” located at <https://www.youtube.com/watch?v=u96V6dRLVNA>. I am aware “250” is a

nickname and rap moniker utilized by MASSEY based upon a review of Instagram posts by MASSEY and his associates. For example, MASSEY's Instagram "Bio" lists the phrase "Two Fifty." In my training and experience, the title of the video indicates the song title is "not again" and the artists are N.E.M. Dotts and 250 (MASSEY).

7. I reviewed the video and observed MASSEY brandishing firearms, surrounded by other individuals brandishing what appear to be firearms and large plastic bags containing marijuana. Specifically, I observed MASSEY brandish an AK pistol at various times throughout the video. Image 7A and Image 7B are screenshots of the video where MASSEY is brandishing the AK-style pistol. I sent Firearms Enforcement Officer (FEO) James Barlow, assigned to the ATF Firearms and Ammunition Technology Division, images of the AK pistol. FEO Barlow advised the firearm appeared to be a Century Arms RAS47 7.62 caliber pistol. Special Agent Brandon compared the AK pistol in the YouTube video to a stock image of a Century Arms RAS47 7.62 caliber pistol (Image 7C) and noted the following similar characteristics: the three (3) slots and serrations on the foregrip, the shape and location of the front sight in relation to the barrel, the shape and location of the magazine release, the shape and location of the charging handle, and the overall shape of the frame and receiver.





*Image 7A*



*Image 7B*



*Image 7C*

8. I also observed MASSEY brandish what appears to be a black Glock pistol with a magazine inserted at several points in the video. Images 8A and 8B are screenshots of the video where MASSEY is brandishing the black Glock. The firearm MASSEY is brandishing in the video has the following characteristics consistent with Glock pistols: the shape of the trigger guard, the shape of the slide, the location of the serial number on the top of the frame just below the slide, and the unique shape of the floor plate of the extended magazine inserted into the firearm. I am extremely familiar with Glock pistols as I have seized and investigated dozens of Glock firearms and have also carried Glock pistols in the performance of my official duties for nearly eight (8) years.



*Image 8A*



*Image 8B*

9. I identified MASSEY as the individual wearing the dark gray Dickies short sleeve collared shirt with buttoned pockets over both breasts, dark gray Dickies pants based, and black face covering brandishing the subject firearms based on MASSEY's tattoos, physical build, and the clothes he is wearing.

10. On or about May 5, 2021, Instagram User ID “eastbabyslim” posted several images of MASSEY wearing a dark gray Dickies collared shirt, dark gray dickies pants, and a black face covering, similar to the ones in the YouTube video. See Image 10A. On May 19, 2021—after the “not again” video was uploaded to YouTube—Instagram User ID “eastbabyslim” deleted the post.



*Image 10A*

11. In the video, I observed bricks and a “\$” tattooed on the right forearm of the black male wearing the dark gray Dickies outfit and black face covering. See Images 11A. MASSEY has bricks and a “\$” tattooed on his right forearm. See Image 11B, posted by Instagram User ID “eastbabyslim” on May 2, 2021. Image 11C is a zoomed-in image of Image 11B.



*Image 11A*



*Image 11B*



*Image 11C*



12. The “not again” video offers a disclaimer at the beginning of the video that “any props used in this video that show resemblance to any illegal materials are merely props and should not be taken seriously. Dont [sic] try this at home.” However, there are several distinct features about the firearms featured in the video that distinguish them from “props.” In addition to the firearm-specific features discussed in paragraphs 7 and 8, many of the firearms in the “not again” video had ammunition visible in their chambers when pointed at the camera.

13. On May 14, 2021, Instagram User ID “cclrell,” a self-proclaimed CCL gang member, posted several images and videos to the user’s story regarding a video shoot. First, Instagram User “cclrell” posted an image containing the text, “250 x Double S video shoot pull up gang only” and tagged Instagram User ID “eastbabyslim.” The next several stories, posted at approximately 10:00 pm, showed what appears to be the same individuals (including MASSEY) as were featured in the “not again” video. The individuals were wearing the same clothing and holding the same firearms from the YouTube music video, including the Century Arms RAS47 7.62 caliber pistol.

14. I understand the text “250 x Double S video shoot pull up gang only” to mean that Instagram User ID “cclrell” was attending a music video shoot for a song performed by artists “250” (MASSEY) and another individual, and that other

CCL gang members were invited to attend. I know the identity of Instagram User ID “cclrell” and know him to be local to the Eastern District of Michigan.

15. On May 14, 2021, at 11:06 am, MASSEY was released from the Oakland County Jail after posting bond related to a state offense.

16. On May 15, 2021, shortly after midnight, MASSEY texted United States Probation Officer Seth Martin that he was released from Oakland County Jail, tested positive for COVID, and that he needed to quarantine for two weeks.

17. On May 19, 2021, MASSEY told Probation Officer Martin that he has been staying at his girlfriend’s residence since he was released from Oakland County Jail on May 14, 2021.


18. Probation Officer Martin advised me that MASSEY did not request permission or report leaving the Eastern District of Michigan at any point during his supervision.

19. On May 19, 2021, Special Agent Brandon contacted ATF Interstate Nexus Expert, Special Agent Michael Jacobs and provided a verbal description of the Century Arms RAS47 7.62 caliber pistol and Glock pistol. Based upon the verbal description, Special Agent Jacobs advised the firearms are firearms as defined under 18 U.S.C. § 921 and manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

**CONCLUSION**

20. Based upon the aforementioned facts stated herein, there is probable cause to believe JEREMY MASSEY JR. (B/M; DOB: XX/XX/2001), a convicted felon aware of his felony conviction, did knowingly and intentionally possess a Century Arms RAS47 7.62 caliber pistol and Glock pistol, firearms having affected interstate commerce, in violation of 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm. Said violation occurring on or about May 14, 2021, in the Eastern Judicial District of Michigan.

Respectfully submitted,

  
Brett J. Brandon, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

  
Hon. R. Steven Whalen  
United States Magistrate Judge

Dated: May 20, 2021